

September 11, 2006

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W.
Suite TW-A325
Washington, D.C. 20554

NOTICE OF WRITTEN EXPARTE SUBMISSION

Re: VoIP Provider Access to NANP Numbering Resources
CC Docket No. 99-200

Dear Ms. Dortch:

On behalf of the Connecticut Department of Public Utility Control, submitted herewith for filing in the above-referenced matter are an original and one copy of the attached written ex parte submission regarding the above-identified matter.

Any questions concerning this matter should be directed to Peter Pescosolido, 860.827.2616.

Sincerely,

DEPARTMENT OF PUBLIC UTILITY CONTROL

Louise E. Rickard
Executive Secretary

September 11, 2006

Kevin J. Martin, Chairman
Commissioner Michael J. Copps
Commissioner Jonathan S. Adelstein
Commissioner Deborah Taylor Tate
Commissioner Robert M. McDowell
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: VoIP Provider Access to NANP Numbering Resources

Dear Chairman Martin, Commissioners Copps, Adelstein, Tate and McDowell:

The Connecticut Department of Public Utility Control (CTDPUC) is writing this letter to express its concern over Voice over Internet Protocol (VoIP) and other IP-enabled service providers' ability to obtain numbering resources in a manner that is inconsistent with the Federal Communications Commission's (Commission) existing numbering optimization requirements. Currently, they are not subject to the same number optimization and conservation measures (e.g., they are not required to implement number portability; number pooling; file telephone number utilization reports; etc.) that traditional telecommunications service providers are subject to when accessing numbering resources.

The North American Numbering Council (NANC) was directed to review and provide recommendations on how the Commission's numbering rules should be modified to permit VoIP and IP-enabled service providers' access to resources in a manner which is consistent with the Commission's numbering optimization policies.¹ The NANC complied with that request on August 1, 2005.²

Additionally, during its February 2006 Winter Meetings, the National Association of Utility Regulatory Commissioners (NARUC) adopted a resolution that in part, requested the Commission to review and consider the NANC's recommendations and develop a national policy that balances the effects experienced by consumers resulting from the implementation of new area codes with the needs of IP-enabled service

¹ See *In the Matter of Administration of the North American Numbering Plan*, Order, CC Docket No. 99-200, rel. February 1, 2005, ¶¶1, 11.

² See the August 1, 2005 Letter from then-NANC Chairman Robert C. Atkinson to Thomas Navin, re: VoIP Provider's Access to NANP Numbering Resources.

providers.³ As of this date, the Commission has not taken any action on the NANC's recommendations nor rendered an order adopting the NARUC resolution.

It has been more than one year since the NANC delivered its recommendations concerning IP-enabled service providers' access to North American Numbering Plan (NANP) resources to the Commission. NANP resources continued to be expended albeit under different numbering rules depending upon the provider. For the past several years, the States have been very proactive in managing numbering resources by overseeing code assignments and implementing the Commission's numbering resource optimization and conservation measures. In the opinion of the CTDPU, these measures have successfully slowed the depletion of those resources and extended the date by which the NANP was estimated to exhaust.

Therefore, the CTDPU suggests that a Commission order permitting the States to implement numbering optimization and conservation rules for IP-enabled services is both timely and appropriate. Accordingly, the CTDPU requests that the Commission act quickly and render its order which establishes numbering optimization rules for IP-enabled service providers and delegates to the States the same number optimization and conservation authority that they currently possess for the other service providers so that all providers can access numbering resources on an equitable basis.

Sincerely,

DEPARTMENT OF PUBLIC UTILITY CONTROL

Jack R. Goldberg
Vice Chairman

³ See NARUC Resolution, *Resolution Numbering Policy for IP-enabled Services*, adopted by the NARUC Board of Directors February 15, 2006.